



September 17, 2020

Chair Mary Nichols and Board Members
California Air Resources Board
1001 I St.
Sacramento, CA 95814

COMMENTS TO CARB ON SULFUR HEXAFLUORIDE EMISSIONS RULEMAKING

Chair Nichols and Board Members,

Thank you for the opportunity to comment on the proposed amendments to the regulation of sulfur hexafluoride (SF₆) emissions from gas-insulated switchgear (GIS). We appreciate all of the work being done on reducing this significant climate pollutant.

California must continue to take all feasible measures to address the climate crisis. We are currently experiencing the worst wildfires in recent history, and scientists know that global warming is fueling the fires. Given climate change is main impact of GHG emissions, the expansion of the regulation to include other GHGs, as staff recommended, is key in driving emission reductions. In addition, continuing to regulate SF₆ is critical as it is the most potent and long lasting of the six main GHGs. Given the extremely high global warming potential (GWP) of SF₆, our climate depends on us to phase it out and provide safe alternatives.

California's leading climate programs have spurred innovation for decades, and we must continue to seek new pathways to reducing emissions. Updating the SF₆ emissions regulation to include a continuing gradual phase-out is critical to this goal. These smart regulatory standards will help develop a market for safe alternatives that would not have developed otherwise.

SF₆ Phase-Out

Pursuant to SB 32 and Board Resolution 17-46 requirements to reduce GHG emissions, SF₆ has been regulated for the past 10 years. But in the absence of an updated regulation, the allowable emission rate would remain at one percent instead of continuing to decrease as it has the past 10 years. Statewide SF₆ capacity is growing one to five percent per year, so as capacity grows, so too would expected emissions. We support the phase-out of SF₆ in GIE technologies by July 2025. The rule needs to be strengthened in order to phase it out.

This is critical in eliminating GHG emissions because of its extremely high GWP, small reductions in SF₆ emissions can have a large impact on reducing GHG emissions, which are

the main drivers of climate change. This will enable industry to accelerate the transition to technologies that don't use SF₆.

Exemptions

Any exemptions that are given pursuant to this rule should be reviewed every year in order to have an exemption renewed. A time limit is critical in incentivizing towards a complete phase-out of SF₆.

We oppose the exemptions that some industries are asking for, and further urge the board to only give exemptions as staff has recommended in their proposal. It is vital to hold everyone who emits this gas accountable in order to maintain a decrease in emissions in California's electricity sector.

We appreciate that CARB staff members are working to bring forward new strategies to reduce the impacts of sulfur hexafluoride on our atmosphere. Acting quickly to address this sector will help buy time to stave off the worst climate catastrophe.

Respectfully,

A handwritten signature in black ink, appearing to read 'Julia Randolph', with a stylized flourish at the end.

Julia Randolph
Policy and Outreach Associate